

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC**

In the Matter of	)	
	)	
PAGING COALITION	)	CC Docket No. 01-346
	)	
Request for Declaratory Ruling that	)	
Termination by Verizon of Type 3A	)	
Interconnection Service Would Be Unjust	)	
and Unreasonable, in Violation of Section 201	)	
of the Communications Act, 47 U.S.C. §201,	)	
and Otherwise Unlawful	)	
To:		The Commission, <i>en banc</i>

SUPPLEMENT TO PETITION FOR DECLARATORY RULING

PLEASE TAKE NOTICE that, since the captioned Petition for Declaratory Ruling was filed on November 30, 2001, additional paging companies have become members of the Paging Coalition and have joined as petitioners herein. The additional petitioners include A. V. LAUTAMUS COMMUNICATIONS, INC.; MOBILE COMMUNICATION SERVICE, INC.; RAM TECHNOLOGIES, INC.; SCHUYLKILL MOBILE FONE, INC.; TELEPAGE COMMUNICATION SYSTEMS, INC. and T&T COMMUNICATIONS, INC. d/b/a WEST VIRGINIA PAGING. These petitioners also are common carriers licensed and operating in the Paging and Radiotelephone Service, 47 C.F.R. §22.501, *et seq.*, and/or Private Carrier Paging Service, 47 C.F.R. §90.490, *et seq.*, providing one way paging service to the public. They have interconnection arrangements with Verizon in the states of Kentucky, Ohio, Pennsylvania and West Virginia identical in all material respects to the Type 3A service at issue in this proceeding; and, like the initial petitioners, face termination of the service by Verizon in November 2002 ostensibly because of the advent of wireless local number portability.

The additional petitioners collectively have in excess of 75,000 paging units in service with the Type 3A or comparable interconnection service provided by Verizon. Thus, the Paging Coalition collectively now has in excess of 165,000 customer units facing termination of their interconnection service in November 2002 absent the relief requested in their Petition for Declaratory Ruling.

Respectfully submitted,

s/Kenneth E. Hardman

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January 14, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this 14<sup>th</sup> day of January, 2002, served the foregoing Supplement to Petition for Declaratory Ruling upon Verizon by mailing a true copy thereof, first class postage prepaid, addressed to Mr. Jeffrey W. Ward, Senior Vice President – Regulatory Compliance, Verizon Communications, Inc., 1515 North Courthouse Road, Suite 500, Arlington, VA 22201, and to Mr. John P. Sullivan, Director – Wireless Account Management, Verizon, 402 Fayette Street, Floor 1, Conshohocken, PA 19428.

s/Kenneth E. Hardman

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